UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DONNA WOOD, et al., individually and on behalf of all others similarly situated,

20 Civ. 2489 (LTS)(GWG)

Plaintiffs,

v.

MIKE BLOOMBERG 2020, INC.,

Defendant.

NOTICE OF MOTION FOR LIMITED STAY OF DISCOVERY

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, Defendant Mike Bloomberg 2020, Inc., through its undersigned counsel, will move this Court, before the Honorable Gabriel W. Gorenstein, at the United States District Court, United States Courthouse, 500 Pearl Street, Room 6B, New York, NY 10007, on a date and time to be set by the Court, for an Order, pursuant to Fed. R. Civ. P. 26(c), staying any discovery beyond that ordered by the Court during the July 16, 2020 Initial Case Management Conference pending a decision on Defendant's partial motion to dismiss or to strike the class claims (Dkt. Nos. 110-113).

PLEASE TAKE FURTHER NOTICE that, pursuant to this Court's June 29, 2020 Order (Dkt. No. 119), paragraph 2.B of Magistrate Judge Gorenstein's Individual Practices, and the parties' agreement, any opposition to this motion is due by July 27, 2020, and any reply is due by July 31, 2020.

Dated: July 20, 2020 PROSKAUER ROSE LLP

/s/ Elise M. Bloom____

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